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Attorneys for Plaintiff and the proposed Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

AHMED HIGAZI, on behalf of himself
and a class of those similarly situated,

Plaintiff,

v.

CADENCE DESIGN SYSTEMS, INC.,

Defendant.

Case No. C-07-2813 JW

**REPLY IN SUPPORT OF (1) FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, (2) MOTION FOR
AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF COSTS, AND
(3) MOTION FOR AWARD OF CLASS
REPRESENTATIVE SERVICE PAYMENT**

Date: July 7, 2008
Time: 9:00 a.m.
Courtroom: 8

The Honorable James Ware

1 Plaintiff submits this brief in support of all three pending motions: (1) the parties'
2 Joint Motion for Final Approval of Class Action Settlement, (2) Plaintiff's Motion For Award Of
3 Attorneys' Fees And Reimbursement Of Expenses, and (3) Plaintiff's Motion For Award Of
4 Class Representative Service Payment.

5 **I. No Opposition Has Been Filed.**

6 In accordance with the briefing schedule set forth by the Court, the parties filed
7 these three motions and supporting documentation on Thursday, June 19, 2008. The deadline for
8 oppositions to these motions was Thursday, June 29, 2008. No opposition was filed.

9 **II. The Settlement Administrator Has Updated The Participation Information.**

10 Since the filing of these motions, the Settlement Administrator has continued to
11 process Claim Forms. To reflect the processing of recently received valid Claim Forms, the
12 Settlement Administrator has executed a Supplemental Declaration, which is being submitted
13 herewith. This declaration shows that 184 of the 207 Class members submitted Claim Forms,
14 constituting an outstanding 89% participation rate. No Class member has opted out, and no Class
15 member has objected to any aspect of the Settlement, the attorneys' fees, or the Class
16 representative service payment.

17 **III. Conclusion.**

18 For the reasons sets forth in the opening briefing, and as evidenced by the
19 overwhelmingly enthusiastic response of the Class, the Settlement is fair, reasonable, and
20 adequate, the requested attorneys' fees and costs are reasonable, and the Class representative
21 service payment is reasonable. Plaintiffs respectfully submit that the Court should grant (1) final
22 approval of the Settlement and final class certification and collective action designation, (2) the
23 requested attorneys' fees and reimbursement of expenses, and (3) the requested Class
24 representative service payment.

Respectfully submitted,

Date: July 2, 2008

By: /s/ Jahan C. Sagafi
Jahan C. Sagafi

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Classes*